

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Civil Action No. 04-10619 RCL

JAMES R. MENARD,	)	
Plaintiff	)	
	)	
vs.	)	SUPPLEMENTAL AFFIDAVIT
	)	OF CARL WISTREICH
	)	
C&S WHOLESALE GROCERS,	)	
INC., et al.,	)	
Defendants	)	

I, Carl Wistreich, do depose and state as follows:

1. I am Senior Vice President and Deputy General Counsel at C&S Wholesale Grocers, Inc.
2. C&S is and was in February 2004 a Vermont corporation.
3. In February 2004, C&S had its principal offices located at Old Ferry Road, Brattleboro, Vermont. In February 2004, C&S's executive and administrative offices were located in Vermont.
4. C&S is a wholesale food distribution company. It purchases goods directly from manufacturers or producers, stores those goods in its warehouses, and distributes the product to grocery stores, supermarkets and military bases throughout the United States.
5. In February 2004, C&S had 45 warehouse facilities located in thirteen states. C&S has three operating and two closed warehouse facilities in Massachusetts.
6. C&S employs approximately 10,000 employees, approximately 1200 of which are located in Massachusetts.

7. As of February 2004, C&S maintained its corporate records in Vermont and maintained no principal bank accounts in Massachusetts.

9. As of February 2004, the majority of C&S's payroll checks were issued from Vermont.

10. As of February 2004, C&S's major policy decisions were made in Vermont.

11. As of February 2004, C&S designated in its corporate documents that its official headquarters was in Vermont.

Signed under the penalties of perjury this 15th day of July, 2004.

/s/ Carl Wistreich

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Carl Wistreich